

CMS - Regulation Station

K154 – Fire Watch

K154 requires compliance with LSC Section 9.7.6.1, which states that a facility must be evacuated or an approved fire watch must be conducted when the sprinkler system is out of service for more than four hours in a twenty-four hour period. K155 requires compliance with LSC Section 9.6.1.8, which states that a facility must be evacuated or an approved fire watch must be conducted when the fire alarm system is out of service for more than four hours in a twenty-four hour period. Most facilities adopt policies, often called fire watch policies, to meet the requirements of LSC Sections 9.6.1.8 and 9.7.6.1. The following are a few examples of issues that result in deficiencies being cited at these K tags:

K154/K155

1. The fire watch policy incorrectly addresses the time criteria for instituting the fire watch. The LSC states the fire watch must be conducted if the fire alarm or sprinkler system is out of service for **more than four hours in a twenty-four hour period**. Errors occur when the policy erroneously states the systems must be out of service for more than four hours, which implies four consecutive hours. However, the requirements do not require the outage to last for four consecutive hours. A fire watch must be conducted when the sum of all outages in a twenty-four hour period totals more than four hours.
2. The fire watch policy fails to address contacting all authorities having jurisdiction (AHJ). The Centers for Medicare & Medicaid Services (CMS) is one of the AHJs for the LSC for certified facilities. State agencies (SA) act on behalf of CMS for certification purposes. Therefore, contacting a SA should be addressed in a facility's fire watch policy.
3. The fire watch policy states staff members will be assigned the fire watch in addition to their normal duties. Staff members must be dedicated to the fire watch and cannot conduct a fire watch in addition to their normal duties. A staff member's normal duties would most likely keep them from conducting the fire watch, which must be conducted continuously during the outage, for extended periods of time.

These examples do not address all possible reasons for citations at K154 or K155.

